BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

May 31 3 35 PH '02

CLASSIFICATION AND FEES FOR CONFIRM®

Docket No. MC2002-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS PAUL BAKSHI (APWU/USPS-T1- 1 – 8)

(May 31, 2002)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU") hereby submits interrogatories and requests for production of documents to USPS Witness Paul Bakshi.

Respectfully submitted

Susan L. Catler

O'Donnell, Schwartz and Anderson, P.C.

1300 L Street NW Suite 1200 Washington, DC 20005-4126

Telephone: (202) 898-1707 Facsimile: (202) 862-9276 e-mail: scatler@odsalaw.com

Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

I hereby certify that I have this date served the following document in accordance with the rules of practice.

Susan L. Catler

O'Donnell, Schwartz and Anderson, P.C.

1300 L Street NW Suite 1200 Washington, DC 20005-4126

May 31, 2002

APWU/USPS-T1-1. What information on a mail piece can the Advanced Facer Canceller System read? What barcodes is the Advanced Facer Canceller System capable of reading? Is the Advanced Facer Canceller System capable of being programmed to read PLANET barcodes? Has it been programmed to read PLANET barcodes? If not, is it anticipated that the Advanced Facer Canceller System will be programmed to read PLANET barcodes?

APWU/USPS-T1-2. It appears that the Advanced Facer Canceller System is not included as a piece of equipment used to scan CONFIRM mail. Why not? Is it anticipated that the Advanced Facer Canceller System will be used to scan CONFIRM mail in the future? If not, why not. If so, when?

APWU/USPS-T1-3. How many mailers have applied to participate in the CONFIRM trial program? How many have had their PLANET codes approved for use? How many active users are there?

APWU/USPS-T1-4. Please provide a distribution of the number of participants in the CONFIRM trial program by type of mailer. For example, how many are first class workshare letter mailers, periodical mailers, standard class flat mailers, resellers of PLANET codes, etc. How were these mailers selected? Were these mailers self-selecting or did the Postal Service solicit the participation of certain mailers in order to collect information about different uses of CONFIRM? Do you anticipate that this distribution is representative of the mailers that will use the program? If not, what do you anticipate to be the distribution of mailers and mail pieces that will use the system and on what do you base this belief

APWU/USPS-T1-5. How has the Postal Service used the data gathered from the ASN scan? Since the Postal Service began using the ASN scan, what percentage of the pieces in a CONFIRM mailing have actually been scanned? Please provide this information by mail type. For example, first class workshare letter mail, periodical mail, standard class flat mail, resellers of PLANET codes, etc. What percentage of pieces with PLANET codes in a mailing are scanned?

APWU/USPS-T1-6. What is the average number of times a piece of mail with a PLANET code gets scanned by mail type? For example, first class workshare letter mail, periodical mail, standard class flat mail, resellers of PLANET codes, etc.

APWU/USPS-T1-7. Is the start-the-clock information generated by the ASN Barcode reported to the mailer? Can it be reported to the mailer on request? How is this information used internally by the Postal Service?

APWU/USPS-T1-8. In the following situations, what scans should a CONFIRM mailer expect to see?

- 1) A letter in a FCM 5-digit presort mailing.
- 2) A letter in a FCM 5-digit presort mailing with an unreadable postnet barcode.
- 3) A UAA letter in a FCM 5-digit presort mailing that is
 - a) Returned to sender
 - b) Forwarded.
- 4) A letter in a non-presorted bulk business mailing.
- 5) A UAA letter in a non-presorted bulk business mailing that is
 - a. Returned to sender
 - b. Forwarded.
- 6) A letter in a non-presorted bulk business mailing with an unreadable postnet barcode.
- 7) A CRM letter.
- 8) A BRM letter.